

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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3		
4	UNITED STATES OF AMERICA,	)
5	Plaintiff,	)
6	vs.	)
7	MATTHEW J. TURNIPSEEDE,	)
8	Defendant.	)
9		)

CASE NO. 1:22-CR-0450  
SENIOR JUDGE CHRISTOPHER A. BOYKO  
**MOTION FOR LEAVE TO WITHDRAW**

Pursuant to Local Criminal Rule 57.21, J. MICHAEL MURRAY, ESQUIRE, Berkman, Gordon, Murray & DeVan, local counsel; and RICHARD A. WRIGHT, ESQUIRE, and RUSSELL E. MARSH, ESQUIRE, Wright Marsh & Levy, admitted *pro hac vice*, hereby move this Court for an Order allowing them and their firms to withdraw as counsel for Defendant Matthew Turnipseede, and request that new counsel be appointed to represent Mr. Turnipseede.

**BACKGROUND**

On August 10, 2022, Matthew Turnipseede was indicted in this case. ECF No. 1. On August 22, 2022, Richard A. Wright and Russell E. Marsh of Wright Marsh & Levy in Las Vegas, Nevada, were granted leave to appear *pro hac vice* in this case. ECF Nos. 2-3. J. Michael Murray of Berkman, Gordon, Murray & DeVan has also appeared as local counsel in this case. These counsel have represented Mr. Turipseede in this case in every matter since his initial appearance and arraignment by video on September 8, 2022. ECF Nos. 5-8.

On November 22, 2024, Mr. Turnipseede pleaded guilty to several counts in this case, pursuant to a Plea Agreement. ECF No. 23. On May 21, 2025, Mr. Turnipseede was sentenced by the Court to 65 months of imprisonment. ECF No. 33. He is scheduled to self-report to the U.S. Bureau of Prisons on August 19, 2025.

Mr. Turnipseede retained Mr. Marsh and Mr. Wright in Nevada in 2021, before the commencement of this case, and he has remained a client of Wright Marsh & Levy since that time. He also retained Mr. Murray to represent him as local counsel.



**CONCLUSION**

For the reasons set forth herein, retained counsel request that they and their firms be allowed to withdraw as counsel in this case, and that counsel be appointed for Mr. Turnipseede.

Dated July 11, 2025

Respectfully submitted,

WRIGHT MARSH & LEVY

BY /s/ Russell E. Marsh

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Local Counsel for Defendant Turnipseede

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the 11th day of July, 2025, I caused a copy of the foregoing **MOTION FOR LEAVE TO WITHDRAW** to be served via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list. A copy was also served on Mr. Turnipseed by mail.

BY /s/ Debbie Caroselli  
An employee of Wright Marsh & Levy